

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN

JORGE AJEJANDRO ROJAS  
Plaintiff,

vs.

DV INJURY LAW PLLC,  
VENAR RAAD AYAR and  
DANIEL P. HEILBRUN,  
Defendants.

Case. No. 2:23-cv-12140-LVP-EAS  
Hon. District Court Judge Linda V. Parker  
Hon. Magistrate Judge Elizabeth A. Stafford

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**ANSWER TO COMPLAINT**

NOW COME DEFENDANTS and they answer as follows:

INTRODUCTION

1. These allegation regarding the passion of the Supreme Court cannot be admitted nor denied. The allegation regarding the number of complaints in 2019 is neither admitted nor denied as Defendants do not know the information asserted. It is admitted as to the relevancy of the Telephone Consumer Protection Act of 1991.
2. Defendants deny violations of the TCPA.
3. Defendants deny they were involved in a “campaign” as alleged by Plaintiff.

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4. Admitted.
5. Admitted that Defendants are within the jurisdiction of this Court but deny any wrongful conduct.
6. Admitted.

PARITES

7. It is neither admitted nor deny as Defendants do not know where plaintiff resides.
8. Admitted.

9. Admitted.

10. Admitted.

11. Admitted.

12. It is neither admitted nor denied and Plaintiff is left to his proofs that Defendants acted through their agents, affiliates, employees, officers, members, directors, heirs, successors, assigns, principles, trustees, sureties, subrogees, representatives and/or insurers

#### STATUTORY BACKGROUND

13. The TCPA and its rules and regulations are a matter of public record.

14. Admitted.

15. Neither admitted nor denied.

16. Neither admitted nor denied.

17. Denied as individual party defendants are not automatically liable and the Plaintiff has the burden of proof.

18. Neither admitted nor denied.

19. Denied as individual party defendant are not automatically liable and the plaintiff has the burden of proof.

20. Denied as untrue.

#### ALLEGATIONS

21. Defendants do not currently have information as to whether or not the Plaintiff maintained and used a residential cellular telephone line with phone number (424) xxx-1582.

22. Defendants do not currently have information about this allegation.
23. Defendants do not currently have information as to this allegation.
24. Defendants do not currently have information as to this allegation.
25. Defendants do not currently have information as to Plaintiff registering his phone number or any information as to preventing Plaintiff from using his phone.
26. Neither admitted nor denied.
27. Neither admitted nor denied.
28. Neither admitted nor denied.
29. Neither admitted nor denied.
30. Denied.
31. Neither admitted nor denied.
32. Neither admitted nor denied.
33. Neither admitted nor denied.
34. Admitted
35. Neither admitted nor denied.
36. Neither admitted nor denied.
37. Neither admitted nor denied.
38. Neither admitted nor denied.
39. Neither admitted nor denied.
40. Neither admitted nor denied.

41. Neither admitted nor denied.
42. Neither admitted nor denied.
43. Neither admitted nor denied.
44. Neither admitted nor denied.
45. Neither admitted nor denied.
46. Neither admitted nor denied.
47. Neither admitted nor denied.
48. Neither admitted nor denied.
49. Neither admitted nor denied.
50. Neither admitted nor denied.
51. Neither admitted nor denied.
52. Neither admitted nor denied.
53. Neither admitted nor denied.
54. Neither admitted nor denied.
55. Neither admitted nor denied.
56. Denied.
57. Denied.
58. Denied as injunctive relief is inappropriate here.
59. Denied.
60. Neither admitted nor denied.
61. Neither admitted nor denied.
62. Denied.
63. Denied.

64. Denied.

65. Neither admitted nor denied as to what may become known through discovery.

66. Neither admitted nor denied.

67. Denied.

COUNT 1

68. Admitted.

69. Defendants incorporate their answers.

70. Neither admitted nor denied.

71. Neither admitted nor denied.

72. Denied.

WHEREFORE, Defendants request this Court or the jury dismiss this Count and grant attorney fees and costs against Plaintiff and for Defendants.

PRAAYER FOR RELIEF

WHEREFORE, Defendants request this Court or the jury dismiss this complaint with prejudice, deny all Plaintiff's requested relief, grant attorney fees and costs against Plaintiff and for Defendants  
And such other relief as is deemed appropriate.

Respectfully submitted,  
/S/ Mark L. Teicher (P34301)

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